From: WESchro721@aol.com
Sent: Thursday, July 08, 2004 12:18 PM
To: Currier, Paul M.
Cc: marge@nhacc.org; wberry@envirosystems.com
Subject: Class A lake criteria
Hi Paul:

I've been thinking about the idea of using reference data from undisturbed natural lakes as the standard for Class A lakes which may have been impacted by human activity, as you discussed at the last WQSAC meeting. In general I think it's a good concept. But I worry that natural variations in lakes may be adversely impacted by using such statistical data as a standard for water transfers, or indeed any human activity.

Consider the following hypothetical case. The level of element X is found to vary between 10 and 50 ppm in the lakes that are chosen as the reference. Some of the reference lakes are typically low, usually measuring around 10; others are typically high, usually measuring around 50. This is apparently due to natural variations. If the 75th percentile case is 50 ppm, and we adopt that as the standard for water transfers, that would allow transferring water containing X into a lake which is normally low in X, up to a concentration of 50. That would be counter to what "naturally occurs" in the lake, and would violate the concept of a Class A lake.

This approach over time could lead to a smoothing out of natural variations, with unfortunate effects on the ecosystem.

I think it would be better to say that a diligent effort needs to be made to determine the naturally occurring levels in a lake. Where it is not possible to do so, then one may resort to statistical data from reference lakes.

And, you proposed to make an exception that "if it can be shown the naturally occurring level of element X is higher than the 75th percentile reference number, then the higher number may be used". That should definitely be changed to: " higher or lower".

Is the WQSAC still meeting on Tuesday, 7/13?

Best regards,

Bill Schroeder

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